dc water is life

February 21, 2013

Helder Gil
Legislative Specialist
Department of Consumer and Regulatory Affairs
1100 Fourth Street SW, Room 5164
Washington, DC 20024

Dear Mr. Gil:

This letter is in response to the Notice of Proposed Rulemaking to replace Title 12 (D.C. Construction Codes Supplement) of the District of Columbia Municipal Regulations was published in the *D.C. Register* on December 7, 2012, at 59 DCR 14179-14768. DC Water is submitting the attached comments for your consideration.

If you have questions regarding our comments or would like to discuss any of them in detail feel free to call me at 202-787-2081.

Sincerely,

William Pickering
Government Relations Manager, District of Columbia Water and Sewer Authority

Cc: constructioncodes@dc.gov

COMMENTS ON 12 DCMR SUBTITLE F PLUMBING CODE SUPPLEMENT

1. ***Insert new definition in Section 202 in the Plumbing Code General Definitions to read as follows:***

   HIGH RISK NON-RESIDENTIAL STRUCTURE. Any building whose internal operations pose a health hazard contamination risk to the public water supply. Examples include, but are not limited to hospitals, hemoglobin dialysis centers, funeral homes or mortuary facilities, chemical manufacturing plants, car wash facilities, sewage treatment plants, auxiliary water supply systems, dry cleaners, laboratories, and radioactive facilities.

2. ***Insert new definition in Section 202 in the Plumbing Code General Definitions to read as follows:***

   WATER SERVICE POINT OF ENTRY. The location where the water service connection initially protrudes from the building interior wall or floor to supply the plumbing system.

3. ***Strike definition for LEAD-FREE PIPE AND FITTINGS in Section 202 of the International Plumbing Code General Definition in its entirety and insert new definition in Section 202 in the Plumbing Code its place to read as follows:***

   LEAD-FREE PIPE AND FITTINGS. ANSI/NSF Standard 61, Annex G approved pipe and fittings for applicable use. Containing not more than 0.25 percent lead when used with respect to the wetted surfaces of pipes, pipe fittings, plumbing fittings, and fixtures.

4. ***Strike Section 603.1 of the International Plumbing Code and insert new section in the Plumbing Code its place to read as follows:***

   603.1 Size of water service pipe. The water service pipe shall be sized to supply water to the structure in the quantities and at the pressures required in this code. The water service pipe shall be not less than 1 inch (25.4 mm) in diameter.

5. ***Strike Section 605.2 of the International Plumbing Code and insert new section in the Plumbing Code in its place to read as follows:***

   605.2 Lead content of water supply pipe and fittings. Pipe and pipe fittings, including valves and faucets, utilized in the water supply system shall conform to NSF 61, Annex G and contain not more than 0.25 percent lead when used with respect to the wetted surfaces.

6. ***Strike Section 608.4 of the International Plumbing Code and insert new Section 608.4 in the Plumbing Code in its place to read as follows:***

608.4 Water service piping. Water service piping shall be installed accordance with Sections 603.2 and 603.2.1 and protected against backflow and in accordance with Section 608.4.1 to 608.4.3.

608.4.1 Water service piping backflow prevention. A backflow preventer must be installed on the water service connection to every structure as listed in Table 608.4.1, unless it is an existing facility in accordance with Section 608.4.3. This backflow preventer must be located ahead of any water outlet and within manufacturer specifications.

Table 608.4.1

Facility Type	Service Size	Domestic BFP	Domestic BFP location	Fire BFP	Fire BFP location
Residential or non-residential	1", 1-1/2", and 2"	Dual Check (ASSE 1024)	Domestic BFP must be installed on the discharge side of meter yoke. **Note: if the inlet pressure to the meter yoke is less than 42 psi, the domestic BFP may be installed inside the facility**	**See Section 608.16.4**	Domestic BFP must be installed within 10 feet of domestic water service point of entry
Non-residential	3" and larger	Double Check (ASSE 1015)	Domestic BFP must be installed within 10 feet of domestic water service point of entry	**See Section 608.16.4**	Domestic BFP must be installed within 10 feet of domestic water service point of entry
High Risk Non-Residential (Section 202 and 608.4.2)	Any	Reduced Pressure (ASSE 1013)	Domestic BFP must be installed within 10 feet of domestic water service point of entry	**See Section 608.16.4**	Domestic BFP must be installed within 10 feet of domestic water service point of entry

608.4.2 High Risk Non-Residential Structure. Any building or campus whose internal operations poses a health hazard contamination risk to the public water supply shall be classified as a high risk non-residential facility and shall be required to install a reduced pressure (ASSE 1013) on the water service connection. Examples of high risk non-residential facilities include, but are not limited to, hospitals, hemoglobin dialysis centers, funeral homes or mortuary facilities, chemical manufacturing plants, car wash facilities,

sewage treatment plants, auxiliary water supply systems, e.g. wells, dry cleaners, laboratories, radioactive facilities, and facilities with water reuse system.

608.4.3 Existing water service piping. Existing structures shall not be required to install a backflow preventer on the water service piping.

Exceptions:
1. The existing water service connection is scheduled for repair or replacement.
2. A renovation or construction of more than 50 percent of the total plumbing system value or materials; or
3. Existing structure is classified as high risk water service connection.

7. ***Strike proposed Section 608.16.4 of the proposed Plumbing Code and insert new Section 608.16.4 in the Plumbing Code in its place to read as follows:***

608.16.4 Connections to automatic fire sprinkler systems and standpipe systems. The potable water supply to automatic fire sprinkler and standpipe systems shall be protected against backflow by:

1. A double check (ASSE 1013) or double check detector (ASSE 1048) backflow prevention assembly, if the sprinkler system contains no chemical additives; or

2. A reduced pressure (ASSE 1015) or reduced pressure detector (ASSE 1047) backflow assembly double check fire protection backflow assembly, if the sprinkler system contains chemical additives.

Exceptions:
1. Where systems are installed as a portion of the water distribution system in accordance with the requirements of this code and are not provided with a fire department connection, backflow protection for the water supply system shall not be required.
2. Isolation of the water distribution system is not required for deluge, preaction or dry pipe systems.

8. ***Insert new Section 608.18 in the Plumbing Code to read as follows:***

608.18 Fire hydrant use connections. The use of a fire hydrant, if authorized by DC Water, shall be connected with a reduced pressure backflow assembly (ASSE 1013) suitable for high-hazard applications. The assembly must carry an inspection tag current within six months and be installed within 10 feet of the Hydrant Water Meter and ahead of any water outlet.

COMMENTS ON 12 DCMR SUBTITLE F PLUMBING CODE SUPPLEMENT

9. ***Please clarify Section 1115.12.10 Water quality test in the Plumbing Code. "The quality of the water for the intended applications shall be verified at the point of use in accordance with all applicable requirements of the District of Columbia." What are the District of Columbia requirements this is referring to? Which District agency will implement and enforce this requirement?***

10. ***Strike Section 1115.2 of the proposed Plumbing Code and insert new 1115.2 in the Plumbing Code in its place to read as follows:***

1115.2 Potable Water Connections. Where potable water system is connected to a rainwater collection and conveyance system, the potable water system shall be protected against backflow by an approved air gap described in Section 608.13.1.

11. ***Strike Section 1115.11.7.3 of the proposed Plumbing Code and insert new Section 1115.11.7.3 in the Plumbing Code in its place to read as follows:***

1115.11.7.3 Makeup Water. Where an uninterrupted supply is required for the intended application, potable water shall be provided as a source of make-up water for the storage tank. The potable water supply shall be protected against backflow by an approved air gap described in Section 608.13.1.

12. ***Strike Section 1302.3 of the proposed Plumbing Code and insert new Sections 1302.3 and 1302.3.1 in the Plumbing Code in its place to read as follows:***

1302.3 Makeup water. Potable water shall be supplied as a source of makeup water for the gray water system. The potable water supply shall be protected against backflow by an approved air gap described in Section 608.13.1. There shall be a full-open valve located on the makeup water supply line to the collection reservoir

1302.3.1 Makeup water from other sources. In addition to the makeup water required by Section 1302.3, makeup water supplied to a gray water system from a rainwater collection system complying with Section 1115 shall be allowed where approved. The design of the makeup water connection between the two systems shall be approved prior to installation. The overflow discharge of a rainwater collection system shall not pass through any portion of the gray water system. The potable water supply shall be protected against backflow from the rainwater collection system in accordance with Section 1115.

COMMENTS ON 12 DCMR SUBTITLE B RESIDENTIAL CODE SUPPLEMENT

1. ***Strike Section P2902.3 from the International Residential Code and insert new Section P2902.3 to the Residential Code to read as follows:***

P2902.3 Backflow protection. A means of protection against backflow shall be provided in accordance with Sections P2902.3.1 through P2902.3.6. Backflow prevention applications shall conform to Table P2902.3, except as specifically stated in Sections P2902.4 through P2902.6.

Additions, alterations or repairs to an existing water service connection or to more than 50 percent of an existing plumbing system value or materials, shall require a backflow preventer installed on the water service connection in accordance to Section P2902.6.

2. ***Strike Section P2902.5.4 from the International Residential Code and insert new Section 2902.5.4 to the Residential Code to read as follows:***

P2902.5.4 Connections to automatic fire sprinkler systems. The potable water supply to automatic fire sprinkler and standpipe systems shall be protected against backflow by

1) a double check (ASSE 1013) or double check detector (ASSE 1048) backflow prevention assembly, if the sprinkler system contains no chemical additives; or
2) a reduced pressure (ASSE 1015) or reduced pressure detector (ASSE 1047) backflow assembly double check fire protection backflow, if the sprinkler system contains chemical additives

Exception:
Where systems are installed as a portion of the water distribution system in accordance with the requirements of this code and are not provided with a fire department connection, isolation of the water supply system shall not be required.

3. ***Strike Section 2902.6 in the International Residential Code and insert new Section 2902.6 in the Residential Code to read as follows:***

P2902.6. Protection of water service pipe. A dual check backflow preventer complying with ASSE 1024 and NSF 61 shall be installed on the discharge side of the meter yoke of the water service pipe.

Exception: If the water service supply pressure is below 42 psi and an automatic fire sprinkler system is or will be installed, the dual check backflow preventer complying with ASSE 1024 and NSF 61 maybe installed on the water service connection within 10 feet of the water service point of entry and ahead of any water outlets.

4. ***Insert new Section P2902.7 in the Plumbing Code to read as follows:***

P2902.7 Location of backflow preventers. Access shall be provided to backflow preventers as specified by the manufacturer's installation instructions.

P2902.7.1 Outdoor enclosures for backflow prevention devices. Outdoor enclosures for backflow prevention devices shall comply with ASSE 1060.

P2902.7.2 Protection of backflow preventers. Backflow preventers shall not be located in areas subject to freezing except where they can be removed by means of unions, or are protected by heat, insulation or both.

P2902.7.3 Relief port piping. The termination of the piping from the relief port or air gap fitting of the backflow preventer shall discharge to an *approved* indirect waste receptor or to the outdoors where it will not cause damage or create a nuisance.